

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**ZAO ODESSKY KONJATSCHNYI
ZAWOD, a Ukrainian corporation,**

Plaintiff,

v.

**SIA “BALTMARK INVEST,” a Latvian
corporation,**

**GLOBAL CLOSED JOINT STOCK
COMPANY, a Russian closed joint-stock
company, and**

**ZAO “GRUPPA PREDPRIYATIJ OST,” a
Russian closed joint-stock company,**

Defendants.

Civil Action No. 1:12-cv-515

**Hon. James C. Cacheris
Hon. Ivan D. Davis**

**PLAINTIFF ZAO ODESSKY KONJATSCHNYI ZAWOD’S MOTION FOR
SUMMARY JUDGMENT**

NOW COMES Plaintiff ZAO Odessky Konjatschnyi Zawod, by through its attorneys, who moves and respectfully requests this Court grant its motion for summary judgment. For the reasons described in the accompanying memorandum, Plaintiff requests that this Court issue an order finding that (1) the assignment of the SHUSTOV mark from Defendant Global Closed Joint Stock Company (“Global CJSC”) to SIA “Baltmark Invest” (“Baltmark”) was invalid, as is any such notice of assignment filed at the USPTO, (2) Baltmark has no legal interest in the SHUSTOV mark, and (3) Global CJSC retains any ownership interests it had in the SHUSTOV mark given the invalidation of any assignment of the rights in that mark to Baltmark .

Respectfully submitted,

Dated: November 1, 2013

/s/ Filipp Kofman

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CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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Respectfully submitted,

/s/ Filipp Kofman

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